REMARKS

The present communication responds to the Final Office Action mailed January 4, 2007. In that Final Office Action, the Examiner rejected claims 1, 3-5, 10-22 and 24-26 of the present application. Reconsideration and allowance are respectfully requested for the reasons discussed below.

Rejections Under U.S.C. § 103

Ginsburg in view of Gerson

Claims 1, 3-5 and 24-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U. S. Patent No. 3,150,582 to Gerson. This rejection is traversed for at least the following reasons.

The Examiner asserts that Figure 1 of Ginsburg "shows the die frame B secured in the chase A, in a manner in which the die frame B would slide on the supporting chase surface if the set screws a' were turned." *Office Action, page 17.* This ignores the specific teaching of Ginsburg. Ginsburg specifically teaches set screws A' used to engage the sides of a chase for locking a frame in place and for adjusting the frame and chase relative to each other. Ginsburg explains:

> The frame B is smaller than the frame A, has no bottom plate, and is adapted to be set within the frame A. The set screws A' will engage with the sides of this frame, and by adjusting the set screws relatively to each other the internal frame B may be adjusted to its proper central position with reference to the frame or chase A and be rigidly held therein. *Ginsburg, page 1, lines 59-65.*

Ginsburg has no teaching or suggestion of slidably securing a die frame within a chase to allow adjustment of the die frame in the vertical axis and the horizontal axis. In contrast, Ginsburg teaches only set screws for locking and adjusting the frame with respect to the chase. Set screws do not provide slidable securing of the frame to the chase.

As provided by MPEP 2141.03, a prior art reference must be considered in its entirety, ie.e., as a whole, including portions that would lead away from the claimed invention. The

Examiner's argument purports to disengage the set screws such that the frame B is no longer locked in place in the frame A and then move the frame B. At best, the frame B would be loose within the frame A such that it may be moved. Not only does this ignore the teachings of Ginsburg insofar as Ginsburg teaches using the set screws to adjust positioning of the frame B, it still fails to teach slidable securement of the frame B within the frame A; loose placement of the frame B within the frame A is not any type of securement. Accordingly, Ginsburg cannot teach or suggest "a die frame slidably secured to the chase to allow adjustment of the die frame in the vertical axis and the horizontal axis of the chase," as recited by claim 1.

The Examiner then asserts "it appears from Fig. 1 of Ginsburg, based on the length of the adjustment screws, that the die frame of Ginsburg (B, Fig. 1) is adjustable nearly to the inner limits of the chase frame (A, Fig. 1), save for the limits imposed by the wing nuts." *Office Action, page* 17. In this argument, the Examiner again ignores the teachings of Ginsburg. Ginsburg's teaching is limited to only that movement wherein a die frame is adjusted to a prper central position position, which is central with respect to a chase. Ginsburg explains:

> The set screws A' will engage the sides of this frame, and by adjusting the set screws relatively to each other the internal frame B may be adjusted to its proper central position with reference to the frame or chase A and be rigidly held therein. *Ginsburg, page 1, lines 59-65.*

Accordingly, Ginsburg specifically teaches against movement of the a die frame along a chase from a first vertical end to a second vertical end and from a first horizontal end to a second horizontal end. Ginsburg teaches proper central positioning of internal frame B within frame A. Thus, Ginsburg cannot teach or suggest "a die frame slidably secured to the chase to allow sliding adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end," as recited by claim 1.

The Examiner attempts to use the Gerson reference to correct the fundamental teaching deficiencies of Ginsburg, alleging that Gerson teaches an apparatus for adjusting a die. The Examiner asserts that Gerson teaches coarse adjustment in both planes, specifically referring to the language "the body 51 may be manually shifted along the member 73 for an approximate or coarse displacement," *Office Action, page 17, citing Gerson Col. 4, ll. 6-7.* The Applicants

respectfully assert that manual shifting does not comprise "a coarse horizontal adjustment mechanism," as recited by claim 1.

However, even assuming that Gerson taught all that the Examiner asserts, which the Applicants feel it does not for the reasons previously discussed in the Office Action response dated October 23, 2006, the combination of Ginsburg and Gerson would still fail to teach "a die frame slidably secured to the chase to allow sliding adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end," as recited by claim 1.

Neither Ginsburg nor Gerson, alone or in combination, disclose, teach or suggest "a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end" and "a horizontal guide block movably secured to the chase to slide along the horizontal axis," as recited by Claim 1, as amended. Nor do Ginsburg or Gerson, alone or in combination, disclose, teach, or suggest providing a die fixture including a chase, the chase defining a vertical and horizontal axis and comprising first and second vertical ends and first and second horizontal ends, and a die frame slidably secured to the chase to allow the die frame to slide along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end," as recited by claim 24, as amended. Thus, the applicants respectfully assert that claims 1, 3-5, 24 are patentable over Ginsburg in view of Gerson. Accordingly, it is respectfully requested that the rejection of claims 1, 3-5, 24 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson be withdrawn.

Ginsburg in view of Gerson and further in view of Leibovich et al.

Claims 10, 12, 17 and 18 stand rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 3,150,582 to Gerson and further in view of U. S. Patent No. 4,723,086 to Leibovich et al. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg nor Gerson, alone or in combination, disclose, teach or suggest, at least, "a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end" and "a horizontal guide block movably secured to the chase to slide along the horizontal axis," as recited by Claim 1.

Leibovich et al. disclose a coarse and fine motion positioning mechanism. Leibovich et al. do not correct the fundamental teaching deficiencies of the Ginsburg and Gerson combination. Thus, it is respectfully submitted that the combination of Ginsburg, Gerson and Leibovich et al. does not make obvious claim 1.

As each of claims 10, 12, 17 and 18 depends either directly or indirectly from claim 1, the applicants respectfully assert that claims 10, 12, 17 and 18 are patentable over Ginsburg in view of Gerson and further in view of Leibovich et al. Accordingly, it is respectfully requested that the rejection of claims 10, 12, 17 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson and further in view of Leibovich et al. be withdrawn.

Ginsburg in view of Gerson and Leibovich et al. and further in view of Posh

Claims 11, 13 and 19 stand rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 4,723,086 to Leibovich as applied to claims 10, 12 and 18 and further in view of U.S. Patent No. 3,449,970 to Posh. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg, Gerson nor Leibovich et al., alone or in combination, disclose, teach, or suggest, at least, "a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second

vertical end and from the first horizontal end to the second horizontal end" and "a horizontal guide block movably secured to the chase to slide along the horizontal axis," as recited by Claim 1.

Posh teaches a linear actuator. Posh does not correct the fundamental teaching deficiencies of the Ginsburg, Gerson and Leibovich et al. combination. Thus, it is respectfully submitted that the combination of Ginsburg, Gerson, Leibovich et al. and Posh does not make obvious claim 1.

As each of claims 11, 13 and 19 depend either directly or indirectly from claim 1, the applicants respectfully assert that claims 11, 13 and 19 are patentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Posh. Accordingly, it is respectfully requested that the rejection of claims 11, 13 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Posh be withdrawn.

Ginsburg in view of Gerson and Leibovich et al. and further in view of Gortner

Claims 14-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 3,150,582 to Gerson and U.S. Patent No. 4,723,086 to Leibovich et al. and further in view of U.S. Patent No. 6,598,868 to Gortner. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg, Gerson nor Leibovich et al., alone or in combination, disclose, teach, or suggest, at least "a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end" and "a horizontal guide block movably secured to the chase to slide along the horizontal axis," as recited by Claim 1.

Gortner teaches a clamp mechanism. Gortner does not correct the fundamental teaching deficiencies of the Ginsburg, Gerson and Leibovich et al. combination. Thus, it is respectfully

submitted that the combination of Ginsburg, Gerson, Leibovich et al. and Gortner does not make obvious claim 1.

As each of claims 14-16 depends either directly or indirectly from claim 1, the applicants respectfully assert that claims 14-16 are patentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Gortner. Accordingly, it is respectfully requested that the rejection of claims 14-16 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Gortner be withdrawn.

Ginsburg in view of Gerson and Leibovich et al. and Gortner and further in view of Posh

Claims 20-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 3,150,582 to Gerson and U.S. Patent No. 4,723,086 to Leibovich et al. and U.S. Patent No. 6,598,868 to Gortner and further in view of U.S. Patent No. 3,449,971 to Posh. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg, Gerson, Leibovich et al., nor Gortner, alone or in combination, disclose, teach, or suggest, at least, "a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end" and "a horizontal guide block movably secured to the chase to slide along the horizontal axis," as recited by Claim 1.

Posh teaches a linear actuator. Posh does not correct the fundamental teaching deficiencies of the Ginsburg, Gerson, Leibovich et al. and Gortner combination. Thus, it is respectfully submitted that the combination of Ginsburg, Gerson, Leibovich et al., Gortner and Posh does not make obvious claim 1.

As each of claims 20-22 depend either directly or indirectly from claim 1, the applicants respectfully assert that claims 20-22 are patentable over Ginsburg in view of Gerson, Leibovich et al. and Gortner and further in view of Posh. Accordingly, it is respectfully requested that the

rejection of claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson, Leibovich et al. and Gortner and further in view of Posh be withdrawn.

CONCLUSION

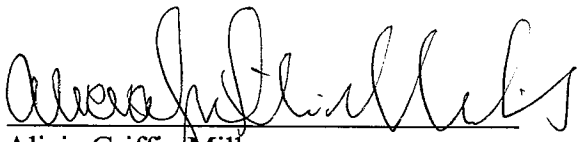
This application now stands in allowable form and reconsideration and allowance are respectfully requested. If the Examiner feels prosecution of the present application could be progressed through an interview with the applicants' representative, the Examiner is asked to call Alicia Griffin Mills at the number provided below.

This response is being submitted on or before July 3, 2007, with the required fee of $1,020.00 for a three-month extension of time, making this a timely response. It is believe that no additional fees are due in connection with this filing. However, the Commissioner is authorized to charge any additional fees, including extension fees or other relief which may be required, or credit any overpayment and notify us of same, to Deposit Account No. 04-1420.

Respectfully submitted,

DORSEY & WHITNEY LLP
Customer Number 25763

Date: July 3, 2007

By: 
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